Honorable Robert S. Lasnik

RECEIVED MAY 03 2018

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

Defendant Jeremy Reeves Civil Action No. 17-CV-1077RSL

ME2 PRODUCTIONS, INC (Plaintiff) **David Lowe**

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Counter Claim & **Supporting Opinions**

*JEREMY REEVES; and Robert Kariuki (Defendants)

Counter Claim

I respectfully request the court and its honorable Judge will allow me the ability to put a best foot forward. Placing equal assumption and foresight into both Plaintiff and Defendant, that strict material monetary cost of forcing the Defendants hand in preparation to engage in open trial by jury will be awarded and immediately collected in the event of a prevailing non-BAR member Defendant. I respectfully request that reasonably expended strictly material monetary cost of throwing a prevailing defense should be reimbursed under the event of a prevailing pro-se Defendant.

Counter Claim 17-cv-1077RSL

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Opinions supporting counter claim

It is apparent that Plaintiff is launching nonstop full speed lawsuits that overwhelming have zero evidence to prove or back them up. Even in the event of a revealing loss, Plaintiff will still suffer no monetary or even lost labor costs repercussions. Plaintiff has no reason to discontinue launching vast arrays of lawsuits against pro-se defendants and those who cannot afford representation. Even in a theoretical situation of Plaintiff losing half of his cases, he would still have absolutely no reason to discontinue launching them as fast as he and his staff can process the copy and paste function into the federal court system. The strict fact of a person's IP and home address is not enough (alone or combined) to claim a person has committed a crime and is civilly liable. Plaintiff will claim otherwise, but it is fully apparent, in the rare case Plaintiff is forced to engage with a competent copyright knowledgeable BAR member he will immediately cut and run away at full speed. Though in instances he has claimed this is not true, the sheer thought of having to reimburse lawyer fees from the likely loss against a competent copyright lawyer is enough to shaken the Plaintiff into immediately dropping his empty prosecution. Likely because Plaintiff (David Lowe) rather than his foreign "client" will pay the fees of a loss, this is a burden and risk Plaintiff (David Lowe) will not accept under any conditions. Thus, Plaintiff employs predatory, coercive, and intimidation tactics against citizens who cannot seek reimbursement of fees against the Plaintiff even when/if Plaintiff is the losing party. Even in the event Plaintiff loses to a pro-se still no actual loss or financial burden will befall him. Plaintiff can pretend the loss never happened and continue forward, while the

prevailing pro-se Defendant is stuck footing the material costs of launching a winning defense. By the way Plaintiff maximizes his computers capabilities (an all his staffs computers) by doing finger exercises on the copy and paste feature, if Plaintiff loses he will only suffer the labor cost of hitting copy and paste, along with paying his staff to hit copy and paste. I've never heard of staff working in this function getting paid more than a hand full of dollars an hour over minimum wage. In the event of losing party status, Plaintiffs most substantial related loss is probably the \$50 he paid the Process server to service papers on Defendants. No intellectual labor resides within any of Plaintiffs current law suites, he more than recouped the intellectual labor of form pleading many copy and paste jobs ago.

My counter claim rests within the idea that in the event of Plaintiffs loss, he shall be required to reimburse me for the strict material costs he is forcing me to expend into my defense. I am not requesting any fees for any time spent articulating and recording my defense. I am not requesting fees for any lost wages and potential or stresses incurred from this lawsuit and situation. I am simply requesting that in the event Plaintiff is the losing party, he will be required to reimburse the material monetary costs incurred from forcing Defendants hand in throwing forth a prevailing defense.

Plaintiff has made it clear in multiple places throughout his very own writings that his law suit is in no way, shape, or form, possessive of the evidence required by law for him to win in court. By his very own writing Plaintiff has expressed that only through discovery he is merely hopeful the defendant will provide the information required for Plaintiff to secure a win.

Plaintiff actively seeks me and every other non-BAR member defendant by predatory,

Counter Claim 17-cv-1077RSL

Jeremy Reeves 13305 Se 19th Street Vancouver WA 98683 360-949-1016 jeremyreeves12@yahoo.com intimidating, and coercive tactics to work for him in a law enforcement investigative manner, to seek out and then give Plaintiff information to secure a win for Plaintiff, whether this information is true or false is typically unknown. Even if said information is possibly not factual, Plaintiff will attempt to pressure Defendants into giving him potentially false information that he will then claim is the smoking gun granting him prevailing status. I am required by no law (civil or criminal) to investigate and operate for the Plaintiff in the law enforcement investigative manner has asked me to do in the past and certainly will request again in the near future. If Plaintiff presents the law that says I must act as an investigator against myself or others on his behalf, then I will move to appease that law in a way the court requests me to do. Plaintiff constantly throws the mirage that a Defendant not acting as an agent and investigator implored by Plaintiffs interests is default proof of guilt. Plaintiff is vividly envisioning and throwing forth grandiose mirages of Defendants guilt. These grandiose mirages appear real to Plaintiff through his own sheer dying thirst to have an ability to pretend he does not lack all and any shred of evidence. I am not thirsty like Plaintiff and will not be fooled by his mirages and projections of guilt. Neither the Court nor its honorable Judge is thirsty for this awkward and embarrassingly noticeable lack of evidence, of any shred of not hiding all facts, hiding witnesses, hiding monetary interests that conveniently exist only overseas for the indefinite future. The court should not be fooled into chasing after these mirages of evidence along with the Plaintiff. Plaintiff is hopeful that through bully and predatory tactics I will operate in interests only beneficial to him, free of charge, implored only for Plaintiffs evidence mirage to secure his win. I will not be implored to investigating my neighbors, my family, my friends, or

Case 2:17-cv-01077-RSL Document 64 Filed 05/03/18 Page 5 of 8

my acquaintances for the abuses of Plaintiffs mirage projections, crimes that Plaintiff has thus far provided no proof of ever even happening.

I have so far incurred what is a substantial loss to my budget that is restricted to highly limited resources, a loss to date near \$650-800. This cost is nothing more than the very basic materials to throw forth my defense thus far. In the name of a long held and respected tradition of fairness in blind justice, I nor any other Defendant (in the event of prevailing Defendant status) should be banned from having strictly material cost reimbursed only because Defendant is not a BAR member. In the event Plaintiff forces me to engage with him in open trial I suspect my strict material costs will raise near \$2500-3500. Plaintiff (only because he is a BAR member) should not be shielded by the court (in the event Plaintiff is losing party) from bearing the burden of these material costs. Unlike the predatory damages and erroneous lawyer fees sought by Plaintiff, this counter claim will only return the Defendant to a monetary position resembling pre lawsuit conditions.

5/2/2018

Counter Claim 17-cv-1077RSL

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1		Honorable Robert S. Lasnik
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4		
5		UNITED STATES DISTRICT COURT
6		WESTERN DISTRICT OF WASHINGTON AT SEATTLE
7		
8		
9	Defendant	Civil Action No. 17-CV-1077RSL
10	Jeremy Reeves	
11		
12		
13		Certificate of service
14		
15	I certify that a true	e and correct copy of the foregoing document has been served to all counsel or parties of
16		record.
17		
18		Lowe Graham Jones
19		701 fifth avenue, suite 4800
20		Seattle, Washington 98104
21		
22		
23		Clerk of the Court
24		United States District Court for the Western District of Washington
25		700 Stewart Street
26		Seattle, WA 98101

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619-748-8686. 360-949-1016 Jeremyreeves12@yahoo.com Case 2:17-cv-01077-RSL Document 64 Filed 05/03/18 Page 7 g 8

Us. District coult western District 700 Stewart Street Scattle, WA 98101 Court Clerk



To Court Clerk US District Court Western District 700 Stewart St Seattle WA 98101

Vancouver WA 98683 US FROM: (360) 949-1016 JEREMY SCOTT REEVES

13305 SE 19TH ST

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